

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	IN BANKRUPTCY
WILLIAM S. KELLER	:	CHAPTER 13 BANKRUPTCY
a/k/a Scott Keller	:	
d/b/a Scott's Towing	:	
Debtor/Movant	:	BK. NO. 1-17-03059
	:	
DOUG GROSS	:	
	:	
v.	:	
	:	
WILLIAM S. KELLER and	:	
ASSISTANT U.S. TRUSTEE	:	
Respondents	:	

DEBTOR'S RESPONSE TO DOUG GROSS
MOTION TO LIFT AUTOMATIC STAY

AND NOW, comes the Debtor, William S. Keller (hereinafter referred to as "Debtor"), by and through his attorney, Deborah A. Hughes, Esquire, of Schiffman, Sheridan & Brown, PC and responds to Doug Gross's Motion to Lift the Automatic Stay upon the following:

1. Denied. According to the docket of the Court of Common Pleas of York County, Douglas Gross, inmate number LR9159, born August 12, 1960, age 57, is currently housed in Camp Hill State Correction Facility for a period of between 5 - 10 years, having pled guilty to the following:

- a. 2 counts of possession of a firearm with the manufacture number altered, etc.
- b. Possession of firearm prohibited.
- c. Possession of controlled substance by person not registered.

See Exhibit "A" attached and made part hereof.

2. Admitted.

3. Admitted.

4. Denied. Movant fails to identify what motor vehicles are in question. Debtor is in possession of a 2006 Mazda 3 and a 2002 Ford 350, which are titled in the name of Northeastern Motors II, LLC.

5. Denied. Vehicles are not titled in the name of convicted felon, Douglas Gross.
6. Denied. Property of the estate pursuant to 11 USC § 541 (a)(1) includes all of the debtor's legal and equitable interests in property. In re Traverse, 753 F.3d 19, 24 (1st Cir 2014).
7. Denied. Movant in this matter is Douglas Gross, while the York County litigation was filed by Northeastern Motors, II to number 2014-SU-002014-74 filed on June 10, 2014. See Exhibit "B" attached hereto made part hereof.
8. Admitted in part but denied that Movant, convicted felon Douglas Gross, is a party to said action.
9. Denied. Northeastern Motors, II was listed as a creditor in Debtor's Chapter 13 petition and notice was also given to Marc Roberts, Esquire, attorney for that creditor.
10. Denied. The confirmed plan requires payment to creditors of \$100,000.00 so all property is necessary to effectuate the plan.

WHEREFORE, Debtor requests that the Motion be denied.

NEW MATTER

11. Paragraphs 1 - 10 above are incorporated herein by reference as if fully set forth within.
12. The Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 1334 (b), 157 (a) and the standing order of reference from the United States District Court for the District of Pennsylvania. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(F) and (K). Venue is proper under 28 U.S.C. § 1408 and 1409(a).
13. Movant Doug Gross is not a party to the York County action as detailed in Exhibit "B".
14. Debtor believes that Movant's attorney, Marc Alan Roberts, Esquire has represented Debtor in past proceedings dealing with Northeastern Motors II LLC.
15. In 2013, among other actions representing Debtor, Marc Roberts, Esquire prepared a power of attorney in favor of Debtor as agent for Northeastern Motors II LLC. A copy of said power of attorney is attached hereto made part hereof as Exhibit "C".

16. The bar date to file claims in the Debtor's Chapter 13 case was December 13, 2017.

17. No claim was filed by Northeastern Motors II, LLC or its counsel Marc Roberts, Esquire or movant Doug Gross. See claims register attached hereto, made part hereof, as Exhibit "D".


18. Debtor's Chapter 13 plan was confirmed on April 18, 2018.

WHEREFORE, Debtor prays that Movant's Motion be dismissed with prejudice and any claim by Doug Gross or Northeastern Motors II LLC be stricken and terminated with prejudice.

Respectfully submitted,

Date:

July 30, 2018



Deborah A. Hughes, Esquire
Schiffman, Sheridan & Brown, PC
2080 Linglestown Road, Suite 201
Harrisburg, PA 17110
(717) 651-1772
Supreme Court I.D. #31060

Exhibit "A"

COURT OF COMMON PLEAS OF YORK COUNTY

DOCKET



Docket Number: CP-67-CR-0004939-2013

CRIMINAL DOCKET

Court Case

Commonwealth of Pennsylvania

v.

Douglas Paul Gross

Page 6 of 19

DISPOSITION SENTENCING/PENALTIES

Disposition

<u>Case Event</u>	<u>Disposition Date</u>	<u>Final Disposition</u>
<u>Sequence/Description</u>	<u>Offense Disposition</u>	<u>Grade</u> <u>Section</u>
<u>Sentencing Judge</u>	<u>Sentence Date</u>	<u>Credit For Time Served</u>
<u>Sentence/Diversion Program Type</u>	<u>Incarceration/Diversionary Period</u>	<u>Start Date</u>
<u>Sentence Conditions</u>		
1 / Manufacture, Delivery, or Possession With Intent to Manufacture or Deliver Bortner, Michael E.	Nolle Prossed 08/18/2014	F 35 § 780-113 §§ A30
2 / Posses Firearm W/Manufacturer Number Altered, Etc Bortner, Michael E. Confinement	Guilty Plea - Negotiated 08/18/2014 Min of 5.00 Years Max of 10.00 Years 5 years to 10 years	F2 1 Days 08/18/2014
To pay such costs as has been imposed. Report to YCP on 08/18/14 @ 5:00 PM		
3 / Posses Firearm W/Manufacturer Number Altered, Etc Bortner, Michael E. Confinement	Guilty Plea - Negotiated 08/18/2014 Min of 5.00 Years Max of 10.00 Years 5 years to 10 years	F2 1 Days 08/18/2014
To pay such costs as has been imposed.		
4 / Possession Of Firearm Prohibited Bortner, Michael E. Confinement	Guilty Plea - Negotiated 08/18/2014 Min of 5.00 Years Max of 10.00 Years 5 years to 10 years	F2 1 Days 08/18/2014
To pay such costs as has been imposed.		
5 / Int Poss Contr Subst By Per Not Reg Bortner, Michael E. Confinement	Guilty Plea - Negotiated 08/18/2014 Min of 6.00 Months Max of 12.00 Months 6 months to 12 months	M 1 Days 08/18/2014
To pay such costs as has been imposed.		
6 / Use/Poss Of Drug Paraph Bortner, Michael E.	Nolle Prossed 08/18/2014	M 35 § 780-113 §§ A32
7 / Make Repairs/Sell/Etc Offens Weap Bortner, Michael E.	Nolle Prossed 08/18/2014	M1 18 § 908 §§ A

CPCMS 9082

Printed: 07/24/2018

Recent entries made in the court filing offices may not be immediately reflected on these docket sheets. Neither the courts of the Unified Judicial System of the Commonwealth of Pennsylvania nor the Administrative Office of Pennsylvania Courts assume any liability for inaccurate or delayed data, errors or omissions on these reports. Docket Sheet information should not be used in place of a criminal history background check which can only be provided by the Pennsylvania State Police. Moreover an employer who does not comply with the provisions of the Criminal History Record Information Act may be subject to civil liability as set forth in 18 Pa.C.S. Section 9183.

Exhibit "B"



CASE DETAILS **NORTHEASTERN MOTORS II LLC vs. WILLIAM SCOTT KELLER**

Public Web User Home Help

2014-SU-002014-74

Close Attachments

Print Dockets ▼

Date filed: 06/10/2014 12:00 AM

Days Open: 1506

Date closed: Status: OPEN

< 1/2 >

CIVIL: TORT - OTHER**Plaintiff**

Name: NORTHEASTERN MOTORS II LLC
 Address: 1700 EAST CANAL RD
 DOVER, PA 17315
 HOME

vs.

Defendant

Name: WILLIAM SCOTT KELLER
 Address: 1536 HILTON AVE
 DOVER, PA 17315
 HOME

Attorney

Name: MARC ALAN ROBERTS, ESQ
 Address: LAW OFFICE OF MARC ROBERTS
 149 EAST MARKET STREET
 YORK, PA 17401
 FIRM ADDRESS 717-843-1639 F#055

Attorney

Name: T KOREY LESLIE, ESQ
 Address: KOREY LESLIE, ATTORNEY-AT-LAW, LLC
 104 EAST KING STREET
 YORK, PA 17401
 FIRM ADDRESS 717-845-5353 F#033

Case Details

SubCategory: < Select SubCategory >

Commencement: < Select Commencement Category >

Filing Options: ☐ Pro Se ☐ Class Action Suit ☐ Money Damages ☐ Outside Arbitration Limits ☐ MDJ Appeal ☐ In Forma Pauperis

Disposition: Final: AOPC:

Public Notes:

Reference Nos.

Case Docket Entries

Date	Category	Description
4/7/2017	RULE TO SHOW CAUSE	RULE TO SHOW CAUSE / RESPONSE FILED BY WILLIAM SCOTT K...
3/21/2017	COURT MINUTE SHEET	COURT MINUTE SHEET
3/21/2017	NOTICE GIVEN RE: PA R. C. P. 236 FAXED	NOTICE GIVEN RE: PA R. C. P. 236 FAXED
3/21/2017	RULE TO SHOW CAUSE RETURNABLE	RULE TO SHOW CAUSE RETURNABLE ON 4-10-17 BY THE COURT ...
3/10/2017	MOTION FOR SANCTIONS	MOTION FOR SANCTIONS W/CERT OF SVC
3/10/2017	MOVING PARTY CERTIFICATION OF GOOD FAITH	MOVING PART CERTIFICATION OF GOOD FAITH
3/10/2017	NOTICE OF PRESENTATION OF MOTION IN MOTION'S CT	NOTICE OF PRESENTATION OF MOTION IN MOTION'S CT
2/16/2017	COURT MINUTE SHEET	COURT MINUTE SHEET
2/16/2017	NOTICE GIVEN RE: PA R. C. P. 236 FAXED	NOTICE GIVEN RE: PA R. C. P. 236 FAXED
2/16/2017	ORDER COMPELLING DISCOVERY	ORDER COMPELLING DEFT TO RESPOND TO DISCOVERY REQUESTS...
2/8/2017	MOVING PARTY CERTIFICATION OF GOOD FAITH	MOVING PART CERTIFICATION OF GOOD FAITH
2/8/2017	MOTION TO COMPEL DISCOVERY	MOTION TO COMPEL DISCOVERY W/CERT OF SVC
2/8/2017	NOTICE OF PRESENTATION OF MOTION IN MOTION'S CT	NOTICE OF PRESENTATION OF MOTION IN MOTION'S CT
11/4/2016	NOTICE GIVEN RE: PA R. C. P. 236	NOTICE GIVEN RE: PA R. C. P. 236
11/4/2016	ORDER DISMISSING MOTION	ORDER DISMISSING MOTION TO COMPEL DISCOVERY BY THE COU...
10/21/2016	NOTICE OF PRESENTATION OF MOTION IN MOTION'S CT	NOTICE OF PRESENTATION OF MOTION IN MOTION'S CT

10/14/2016 CERTIFICATION

MOVING PARTY CERTIFICATION OF GOOD FAITH

10/14/2016 MOTION TO COMPEL ANSWERS TO DISCOVERY

MOTION TO COMPEL DISCOVERY W/ CERT OF SVC

10/14/2016 NOTICE OF PRESENTATION OF MOTION IN
MOTION'S CT

NOTICE OF PRESENTATION OF MOTION IN MOTION'S CT

7/11/2014 ANSWER TO COMPLAINT

ANSWER TO COMPLAINT W/CERT OF SVC

7/3/2014 DEFAULT NOTICE RE: 237.1 (DEFENSE)

DEFAULT NOTICE RE: PA R C P 237.1 (DEFENSE) W/CERT OF SVC

6/18/2014 SHERIFF RETURN OF SERVICE

SHERIFF RETURN OF SERVICE COMPLAINT SERVED ON WILLIAM ...

6/19/2014 COMPLAINT IN A CIVIL ACTION

COMPLAINT IN REPLEVIN

Case Judgments

Date

Creditor

Debtor

Description

Amount

...

Exhibit "C"

THE PURPOSE OF THIS POWER OF ATTORNEY IS TO GIVE THE PERSON YOU DESIGNATE (YOUR "AGENT") BROAD POWERS TO HANDLE YOUR PROPERTY, WHICH MAY INCLUDE POWERS TO SELL OR OTHERWISE DISPOSE OF ANY REAL OR PERSONAL PROPERTY WITHOUT ADVANCE NOTICE TO YOU OR APPROVAL BY YOU.

THIS POWER OF ATTORNEY DOES NOT IMPOSE A DUTY ON YOUR AGENT TO EXERCISE GRANTED POWERS, BUT WHEN POWERS ARE EXERCISED, YOUR AGENT MUST USE DUE CARE TO ACT FOR YOUR BENEFIT AND IN ACCORDANCE WITH THIS POWER OF ATTORNEY.

YOUR AGENT MAY EXERCISE THE POWERS GIVEN HERE THROUGHOUT YOUR LIFETIME, EVEN AFTER YOU BECOME INCAPACITATED, UNLESS YOU EXPRESSLY LIMIT THE DURATION OF THESE POWERS OR YOU REVOKE THESE POWERS OR A COURT ACTING ON YOUR BEHALF TERMINATES YOUR AGENT'S AUTHORITY.

YOUR AGENT MUST KEEP YOUR FUNDS SEPARATE FROM YOUR AGENT'S FUNDS.

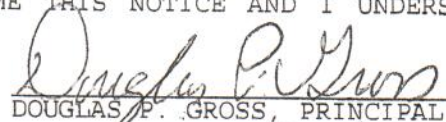
A COURT CAN TAKE AWAY THE POWERS OF YOUR AGENT IF IT FINDS YOUR AGENT IS NOT ACTING PROPERLY.

THE POWERS AND DUTIES OF AN AGENT UNDER A POWER OF ATTORNEY ARE EXPLAINED MORE FULLY IN 20 PA.C.S. CH. 56.

IF THERE IS ANYTHING ABOUT THIS FORM THAT YOU DO NOT UNDERSTAND, YOU SHOULD ASK A LAWYER OF YOUR OWN CHOOSING TO EXPLAIN IT TO YOU.

I HAVE READ OR HAD EXPLAINED TO ME THIS NOTICE AND I UNDERSTAND ITS CONTENTS.

DATE: May 21, 2013


DOUGLAS P. GROSS, PRINCIPAL

ACKNOWLEDGMENT BY AGENT

I HAVE READ THE ATTACHED POWER OF ATTORNEY AND AM THE PERSON IDENTIFIED AS THE AGENT FOR THE PRINCIPAL. I HEREBY ACKNOWLEDGE THAT IN THE ABSENCE OF A SPECIFIC PROVISION TO THE CONTRARY IN THE POWER OF ATTORNEY OR IN 20 PA.C.S. WHEN I ACT AS AGENT:

I SHALL EXERCISE THE POWERS FOR THE BENEFIT OF THE PRINCIPAL.

I SHALL KEEP THE ASSETS OF THE PRINCIPAL SEPARATE FROM MY ASSETS.

I SHALL EXERCISE REASONABLE CAUTION AND PRUDENCE.

I SHALL KEEP A FULL AND ACCURATE RECORD OF ALL ACTIONS, RECEIPTS AND DISBURSEMENTS ON BEHALF OF THE PRINCIPAL.

DATE: May 22, 2013


WILLIAM S. KELLER, AGENT

THE PERSON SIGNING THE POWER OF ATTORNEY IS REFERRED TO IN THIS NOTICE AS THE "PRINCIPAL."

THE PERSON WHO IS GIVEN THE POWER TO ACT IN THIS POWER OF ATTORNEY IS REFERRED TO AS THE "AGENT," BUT MAY BE REFERRED TO IN GENERAL USAGE AS THE "POWER OF ATTORNEY," "TRUE AND LAWFUL ATTORNEY," OR "ATTORNEY-IN-FACT."

SPECIAL POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS, that I, DOUGLAS P. GROSS, have made, constituted and appointed and by these presents do make, constitute, and appoint WILLIAM S. KELLER, my true and lawful attorney for me and in my name, place and stead, with respect to any and all matters with respect to the business known as Northeastern Motors II, Inc., of which I am the sole shareholder and officer.

Giving and granting unto my said attorney by these presents my full and complete authority to act as fully and completely in the premises as I might do if personally present, and to do all lawful acts requisite for effecting the premises; hereby ratifying and confirming all that the said attorney shall do therein by virtue of these presents. Included shall be the power to do all enumerated acts set forth in Pa.C.S.A. Title 20, Chapter 56, Sections 5602, Subsection (a) (11), and Section 5603, Subsection (j), as amended to the date of this instrument.

IN WITNESS WHEREOF, intending to be legally bound, I have hereunto set my hand and seal this 21st day of May, 2013.

WITNESS:

Karen Blair

Douglas P. Gross (SEAL)
DOUGLAS P. GROSS

COMMONWEALTH OF PENNSYLVANIA

:

SS

COUNTY OF YORK

:

On this, the 21st day of May, 2013, before me, a notary public, the undersigned officer, personally appeared DOUGLAS P. GROSS known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same freely and voluntarily for the purpose therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.

[Signature]
NOTARY PUBLIC

MY COMMISSION EXPIRES:

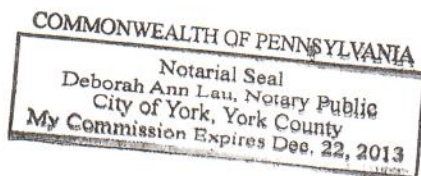


Exhibit "D"

Middle District of Pennsylvania Claims Register

[1:17-bk-03059-HWV William S. Keller and Douglas Gross](#)

Judge: Henry W. Van Eck**Chapter:** 13**Office:** Harrisburg**Last Date to file claims:** 12/13/2017**Trustee:** Charles J DeHart, III (Trustee)**Last Date to file (Govt):** 01/21/2018

Creditor: (4953736) York County Tax Claim Bureau 28 East Market Street York, PA 17401	Claim No: 1 <i>Original Filed</i> Date: 08/04/2017 <i>Original Entered</i> Date: 08/04/2017	Status: <i>Filed by:</i> CR <i>Entered by:</i> April Garner <i>Modified:</i>																		
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Priority	claimed:	\$17843.58	<input type="text"/>	<input type="text"/>	<input type="text"/>															
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Details	<input type="checkbox"/>	1-1	08/04/2017	Claim #1 filed by York County Tax Claim Bureau, Amount claimed: \$17843.58 (Garner, April)																
Description: 																				
Remarks: (1-1) all boxes checked																				

Creditor: (4949923) Internal Revenue Service PO Box 21126 Philadelphia, PA 19114	Claim No: 2 <i>Original Filed</i> Date: 08/22/2017 <i>Original Entered</i> Date: 08/22/2017 <i>Last Amendment Filed:</i> 08/30/2017 <i>Last Amendment Entered:</i> 08/30/2017	Status: <i>Filed by:</i> CR <i>Entered by:</i> Internal Revenue Service <i>Modified:</i>																		
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Details	<input type="checkbox"/>	2-1	08/22/2017	Claim #2 filed by Internal Revenue Service, Amount claimed: \$2903.34 (Internal Revenue Service)																
Details	<input type="checkbox"/>	2-2	08/30/2017	Amended Claim #2 filed by Internal Revenue Service, Amount claimed: \$0.00 (Internal Revenue Service)																
Description: 																				
Remarks:																				

Creditor: (4963352) Columbia Gas of Pennsylvania PO Box 117 Columbus, OH 43216	Claim No: 3 <i>Original Filed</i> Date: 08/31/2017 <i>Original Entered</i> Date: 08/31/2017	Status: <i>Filed by:</i> CR <i>Entered by:</i> April Garner <i>Modified:</i>					
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History:							
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Details		3-1	08/31/2017	Claim #3 filed by Columbia Gas of Pennsylvania, Amount claimed: \$1624.05 (Garner, April)			
Description:							
Remarks:							

Creditor: (4982636) Premier Bankcard, Llc Jefferson Capital Systems LLC Assignee Po Box 7999 Saint Cloud Mn 56302-9617	Claim No: 4 <i>Original Filed</i> Date: 10/20/2017 <i>Original Entered</i> Date: 10/20/2017	Status: <i>Filed by:</i> CR <i>Entered by:</i> Shelbey Rae Jurek <i>Modified:</i>					
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Amount	claimed:	\$458.20					
History:							
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Details		4-1	10/20/2017	Claim #4 filed by Premier Bankcard, Llc, Amount claimed: \$458.20 (Jurek, Shelbey)			
Description: (4-1) CREDIT CARD							
Remarks:							

Creditor: (4988902) LVNV Funding, LLC its successors and assigns as assignee of MHC Receivables, LLC Resurgent Capital Services PO Box 10587 Greenville, SC 29603-0587	Claim No: 5 <i>Original Filed</i> Date: 11/06/2017 <i>Original Entered</i> Date: 11/06/2017	Status: <i>Filed by:</i> CR <i>Entered by:</i> DeAnna Gambrell <i>Modified:</i>										
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Amount	claimed:	\$1165.35										
Secured	claimed:	\$0.00										
History:												
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Details		5-1	11/06/2017	Claim #5 filed by LVNV Funding, LLC its successors and assigns as, Amount claimed: \$1165.35 (Gambrell, DeAnna)								
Description:												
Remarks:												

Creditor: (5000174) AT&T Mobility II LLC %AT&T SERVICES INC. KAREN A. CAVAGNARO LEAD PARALEGAL ONE AT&T WAY, SUITE 3A104 BEDMINSTER, NJ. 07921	Claim No: 6 <i>Original Filed</i> Date: 12/07/2017 <i>Original Entered</i> Date: 12/07/2017	Status: <i>Filed by:</i> CR <i>Entered by:</i> Roxanne Cox <i>Modified:</i>					
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Details		6-1	12/07/2017	Claim #6 filed by AT&T Mobility II LLC, Amount claimed: \$3025.13 (Cox, Roxanne)			
Description:							
Remarks:							

Creditor: (4949920) DRB, Inc. d/b/a Superior Homes 2187 Lincoln Highway East Lancaster, PA 17602	Claim No: 7 <i>Original Filed</i> Date: 12/07/2017 <i>Original Entered</i> Date: 12/07/2017	Status: <i>Filed by:</i> CR <i>Entered by:</i> Matthew S Bleacher <i>Modified:</i>															
<table border="1"> <tr> <td>Amount</td> <td>claimed:</td> <td>\$144732.36</td> <td></td> <td></td> </tr> <tr> <td>Secured</td> <td>claimed:</td> <td>\$136000.00</td> <td></td> <td></td> </tr> <tr> <td>Priority</td> <td>claimed:</td> <td>\$0.00</td> <td></td> <td></td> </tr> </table>			Amount	claimed:	\$144732.36			Secured	claimed:	\$136000.00			Priority	claimed:	\$0.00		
Amount	claimed:	\$144732.36															
Secured	claimed:	\$136000.00															
Priority	claimed:	\$0.00															
History:																	
<table border="1"> <tr> <td>Details</td> <td></td> <td>7-1</td> <td>12/07/2017</td> <td>Claim #7 filed by DRB, Inc. d/b/a Superior Homes, Amount claimed: \$144732.36 (Bleacher, Matthew)</td> </tr> </table>			Details		7-1	12/07/2017	Claim #7 filed by DRB, Inc. d/b/a Superior Homes, Amount claimed: \$144732.36 (Bleacher, Matthew)										
Details		7-1	12/07/2017	Claim #7 filed by DRB, Inc. d/b/a Superior Homes, Amount claimed: \$144732.36 (Bleacher, Matthew)													
Description:																	
Remarks:																	

Creditor: (5001466) LVNV Funding, LLC c/o Resurgent Capital Services P.O. Box 10587 Greenville, SC 29603-0587	Claim No: 8 <i>Original Filed</i> Date: 12/11/2017 <i>Original Entered</i> Date: 12/11/2017	Status: <i>Filed by:</i> CR <i>Entered by:</i> DeAnna Gambrell <i>Modified:</i>					
<table border="1"> <tr> <td>Amount</td> <td>claimed:</td> <td>\$594.13</td> <td></td> <td></td> </tr> </table>			Amount	claimed:	\$594.13		
Amount	claimed:	\$594.13					
History:							
<table border="1"> <tr> <td>Details</td> <td></td> <td>8-1</td> <td>12/11/2017</td> <td>Claim #8 filed by LVNV Funding, LLC, Amount claimed: \$594.13 (Gambrell, DeAnna)</td> </tr> </table>			Details		8-1	12/11/2017	Claim #8 filed by LVNV Funding, LLC, Amount claimed: \$594.13 (Gambrell, DeAnna)
Details		8-1	12/11/2017	Claim #8 filed by LVNV Funding, LLC, Amount claimed: \$594.13 (Gambrell, DeAnna)			
Description:							
Remarks:							

Creditor: (4955125) Eugene R. Campbell 2205 E. Market Street York, PA 17402	Claim No: 9 Original Filed Date: 12/13/2017 Original Entered Date: 12/13/2017	Status: Filed by: CR Entered by: Webclaimusr Modified:					
<table border="1"> <tr> <td>Amount</td> <td>claimed:</td> <td>\$4420.00</td> <td></td> <td></td> </tr> </table>			Amount	claimed:	\$4420.00		
Amount	claimed:	\$4420.00					
History: <table border="1"> <tr> <td>Details</td> <td></td> <td>9-1</td> <td>12/13/2017</td> <td>Claim #9 filed by Eugene R. Campbell, Amount claimed: \$4420.00 (Webclaimusr)</td> </tr> </table>			Details		9-1	12/13/2017	Claim #9 filed by Eugene R. Campbell, Amount claimed: \$4420.00 (Webclaimusr)
Details		9-1	12/13/2017	Claim #9 filed by Eugene R. Campbell, Amount claimed: \$4420.00 (Webclaimusr)			
Description:							
Remarks:							

Creditor: (4949924) Jay Enterprises Inc. 3880 Union Deposit Road Harrisburg, PA 17109	Claim No: 10 Original Filed Date: 03/06/2018 Original Entered Date: 03/06/2018	Status: Filed by: AT Entered by: Deborah A. Hughes Modified:										
<table border="1"> <tr> <td>Amount</td> <td>claimed:</td> <td>\$1014.50</td> <td></td> <td></td> </tr> <tr> <td>Secured</td> <td>claimed:</td> <td>\$1014.50</td> <td></td> <td></td> </tr> </table>			Amount	claimed:	\$1014.50			Secured	claimed:	\$1014.50		
Amount	claimed:	\$1014.50										
Secured	claimed:	\$1014.50										
History: <table border="1"> <tr> <td>Details</td> <td></td> <td>10-1</td> <td>03/06/2018</td> <td>Claim #10 filed by Jay Enterprises Inc., Amount claimed: \$1014.50 (Hughes, Deborah)</td> </tr> </table>			Details		10-1	03/06/2018	Claim #10 filed by Jay Enterprises Inc., Amount claimed: \$1014.50 (Hughes, Deborah)					
Details		10-1	03/06/2018	Claim #10 filed by Jay Enterprises Inc., Amount claimed: \$1014.50 (Hughes, Deborah)								
Description:												
Remarks:												

Claims Register Summary

Case Name: William S. Keller and Douglas Gross

Case Number: 1:17-bk-03059-HWV

Chapter: 13

Date Filed: 07/25/2017

Total Number Of Claims: 10

Total Amount Claimed*	\$174877.30
Total Amount Allowed*	

*Includes general unsecured claims

The values are reflective of the data entered. Always refer to claim documents for actual amounts.

	Claimed	Allowed
Secured	\$154858.08	
Priority	\$17843.58	

Administrative		
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PACER Service Center			
Transaction Receipt			
07/23/2018 14:13:19			
PACER Login:	ss1330:2640545:0	Client Code:	
Description:	Claims Register	Search Criteria:	1:17-bk-03059-HWV Filed or Entered From: 1/1/1980 Filed or Entered To: 7/23/2018
Billable Pages:	1	Cost:	0.10

VERIFICATION

I, William S. Keller, Debtor herein, do hereby verify that I have read the foregoing Response to Doug Gross's Motion for Relief from Stay and that it is true and correct to the best of my knowledge, information and belief.

/s/

William S. Keller

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

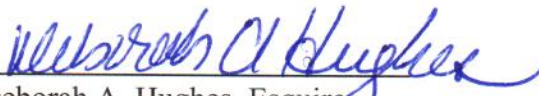
IN RE:	:	IN BANKRUPTCY
WILLIAM S. KELLER	:	CHAPTER 13 BANKRUPTCY
a/k/a Scott Keller	:	
d/b/a Scott's Towing	:	
Debtor/Movant	:	BK. NO. 1-17-03059
	:	
DOUG GROSS	:	
	:	
v.	:	
	:	
WILLIAM S. KELLER and	:	
ASSISTANT U.S. TRUSTEE	:	
Respondents	:	

CERTIFICATE OF SERVICE

On this, the 30 day of July, 2018, I, Deborah A. Hughes, Esquire, do hereby certify that a true and correct copy of the foregoing Response was served by depositing same in first-class U.S. mail, postage prepaid and/or via electronic mail, to the following:

Charles J. DeHart, III, Esquire
Trustee
8125 Adams Drive #A
Hummelstown, PA 17036

Marc Roberts, Esquire
149 East Market Street
York, PA 17401


Deborah A. Hughes, Esquire